

ALEX G. TSE (CABN 152348)
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
Eureka
~~SAN FRANCISCO~~ DIVISION

UNITED STATES OF AMERICA,)	NO. CR 17-449 RMI-1
)	
Plaintiff,)	STIPULATION TO CONTINUE STATUS
)	CONFERENCE AND EXCLUDE TIME AND
v.)	[PROPOSED] ORDER
)	
TIMOTHY LYNN HOWARD,)	
)	
Defendant.)	

STIPULATION

The above-captioned matter is currently set for a status conference on January 22, 2018, at 1:00 pm. The parties now stipulate and respectfully request that the status conference be continued until March 12, 2018. The parties are engaged in productive discussions regarding the resolution of the case and anticipate that the defendant will be ready to enter a change of plea on that date.

The parties further stipulate that the time between January 22, 2018, and March 12, 2018, be excluded under the Speedy Trial Act pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B). Excluding such time will allow counsel the reasonable time necessary for effective preparation, taking into account

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STIPULATION TO CONTINUE AND TO EXCLUDE TIME AND [~~PROPOSED~~] ORDER
CR 17-449 RMI-1

1 the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

2 IT IS SO STIPULATED.

3 DATED: January 19, 2018

ALEX G. TSE
Acting United States Attorney

4
5 /s/
6 JULIE D. GARCIA
Assistant United States Attorney

7 DATED: January 19, 2018

8
9 /s/
10 GRACE DiLAURA
Counsel for Defendant
11 TIMOTHY LYNN HOWARD

12
13 **~~PROPOSED~~ ORDER**

14 Based on the parties' stipulation, the Court hereby ORDERS that the status conference currently
15 set for January 22, 2018, at 1:00 pm, be continued to March 12, 2018, at 1:00 pm.

16 The Court finds that the exclusion of the period from January 22, 2018, to March 12, 2018, from
17 the time limits applicable under 18 U.S.C. § 3161, is warranted; that the ends of justice served by the
18 continuance outweigh the interests of the public and the defendant in the prompt disposition of this
19 criminal case; and that the failure to grant the requested exclusion of time would unreasonably deny
20 counsel the reasonable time necessary for effective preparation, taking into account the exercise of due
21 diligence, and would result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

22 IT IS SO ORDERED.

23
24 DATED: 1/19/2018


25 HON. ROBERT M. ILLMAN
United States Magistrate Judge